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12 Attorneys for Plaintiff
13 BLUE CROSS AND BLUE SHIELD ASSOCIATION

14
15 **UNITED STATES DISTRICT COURT**
16
17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

18
19 BLUE CROSS AND BLUE SHIELD
20 ASSOCIATION, an Illinois not-for-profit
21 corporation,

22 Plaintiff,

23 v.
24 DIGI REAL ESTATE FOUNDATION, et
25 al.,

26 Defendants.

27 No. C 07 5009 RS

28 **STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

29 Action Filed: September 27, 2008
30 Trial Date: None

31
32 **STIPULATION**

33 WHEREAS, the Initial Case Management Conference in this action is currently set for
34 Wednesday, January 16, 2008, at 2:30 p.m.;

35 WHEREAS, Plaintiff Blue Cross and Blue Shield Association has been engaged in
36 settlement discussions with the named Defendants (the "Digi Real Estate Defendants") against
37 whom it has brought its First through Fifth Claims in its Complaint in this action—and who are
38 the relevant stakeholders for its Sixth Claim in its complaint in this action, because they are the
39 owners of the Internet domain-name registrations against whom that in rem claim is brought;

40 WHEREAS, Plaintiff Blue Cross and Blue Shield Association and the Digi Real Estate
41 Defendants believe that having additional time before having to complete and file the Joint Case

1 Management Statement and appear at the Initial Case Management Conference would allow them
2 to concentrate on their settlement discussions—and may lead to resolution of the First through
3 Sixth Claims in the Complaint in this action before the Initial Case Management Conference;

4 WHEREAS, Plaintiff Blue Cross and Blue Shield Association has been engaged in
5 settlement discussions with the relevant non-party stakeholders (the “DigiMedia Stakeholders”)
6 for its Seventh Claim in its complaint in this action, who are the owners of the Internet domain-
7 name registrations against whom that in rem claim is brought;

8 WHEREAS, Plaintiff Blue Cross and Blue Shield Association believes that having
9 additional time before having to complete and file the Joint Case Management Statement and
10 appear at the Initial Case Management Conference would allow it to concentrate on its settlement
11 discussions with the DigiMedia Stakeholders—and may lead to resolution of the Seventh Claim
12 in the Complaint in this action before the Initial Case Management Conference;

13 THEREFORE, the Parties in this action, through their counsel of record, hereby stipulate
14 that the Initial Case Management Conference in this action be continued for 60 days are such
15 other date that may be available and as may be set by the Court—with any Federal Rule 26 or
16 Local Rule 16-9 deadlines triggered by the Initial Case Management Conference being re-set in
17 line with the new, continued date.

18 DATED: January 8, 2008

HANSON BRIDGETT MARCUS
VLAHOS & RUDY, LLP

20 By: /s/

21 SUSAN G. O’NEILL
22 Attorneys for Plaintiff
23 BLUE CROSS AND BLUE SHIELD
24 ASSOCIATION

25 DATED: January 8, 2008

26 NEWMAN AND NEWMAN

27 By: /s/

28 DEREK A. NEWMAN
Attorneys for Defendants
DIGI REAL ESTATE FOUNDATION
KANWARDEEP JOHAR
OLEKSIY KOVYRIN
GALT NETWORKS, INC.

SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Susan G. O'Neill—the ECF User whose User ID and Password are used in the filing of this document—hereby attest that the concurrence to the filing of this document has been obtained from the other signatory to this document.

/s/
SUSAN G. O'NEILL

ORDER

Pursuant to stipulation, IT IS SO ORDERED: the Initial Case Management Conference in this case is continued to Wednesday, March 19, 2008 at 2:30 p.m., with any Federal Rule 26 or Local Rule 16-9 deadlines triggered by the Initial Case Management Conference re-set in line with this new, continued date.

DATED: January 8, 2008

Richard Schaefer

HONORABLE RICHARD SEEBORG
U. S. MAGISTRATE JUDGE